

## EXHIBIT 2

# MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

## Background, purpose and disclaimer

### Background

This deck aims to summarize our knowledge about a person's consent experience on Google. Insights are primarily based on consent research that we've been conducting since 2016, both in qualitative settings e.g. [Pinecone](#) lab and in-home research as well as in scaled qualitative research (e.g. [Google](#)) and what we've learned from metrics and live experiments. In addition, we've referenced related internal and external research where appropriate.

### Purpose 1: Reference

In many ways, what you will find here are not unique insights. Many things you will have heard in previous presentations, read in research reports or personally observed during user research. Our aim is to provide one reference location for POPO Consent research that can be used by anyone that needs it. Some call it a 'what we know' deck or 'duh' deck :-).

### Purpose 2: inform future consent strategy

As mentioned, many insights here are not new but when combined we feel it provides a great basis to help define Google's future consent strategy. Both the combined insights as well as our recommendations should serve this purpose.

In addition, we believe that consent by itself is not the 'right strategy' so you should see these recommendations as part of a bigger product strategy being created [within the POPO](#) as well in several other places in Google.

### Disclaimer

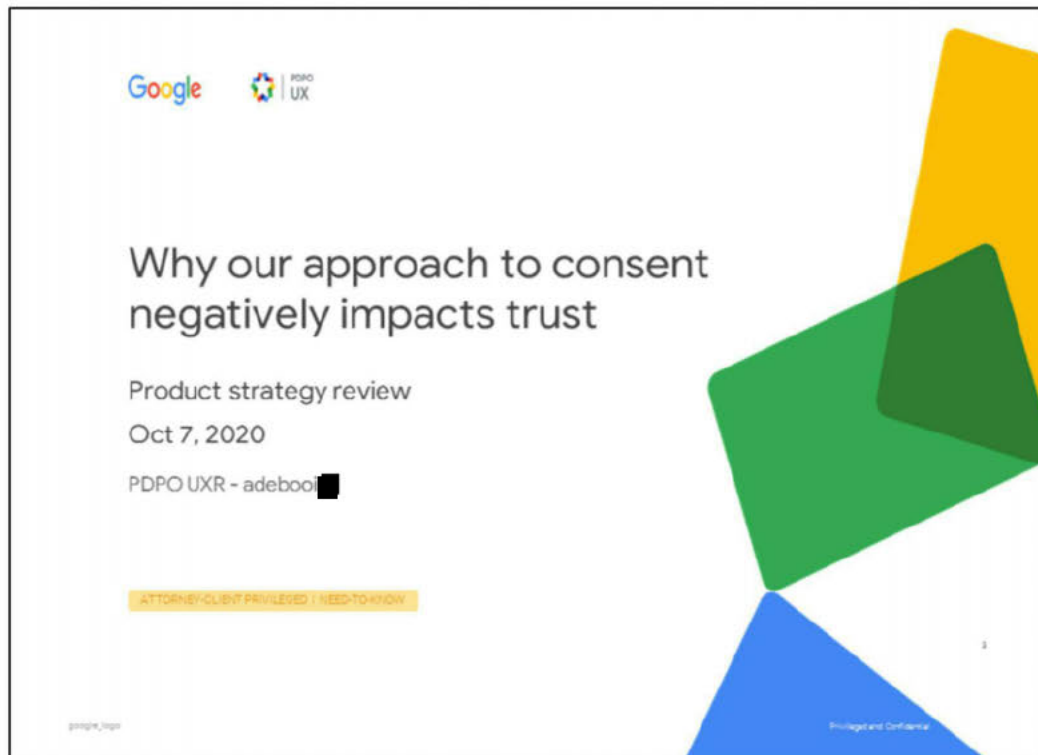
This deck is still a **work in progress** and is not yet complete - detailed insights might be missing or incomplete, recommendations not fully formed etc. Feel free to add comments and questions which we can use to improve and enrich the content.

**Also, this deck has NOT BEEN REVIEWED NOR APPROVED BY PRIVACY LEGAL so not sharing broadly.**

internal only

Proprietary & Confidential

| Id  | Date                | Text  |
|---|---------------------|---|
| 1   | 08/12/2020 07:48:03 | <div data-bbox="543 186 913 206">[REDACTED]essicag[REDACTED]suneet[REDACTED]</div> <div data-bbox="543 210 893 247">Hi Jess,<br/>welcome back, hope you had a good vacation.</div> <div data-bbox="543 257 1275 374"><div>Redacted - Privilege</div></div> <div data-bbox="543 390 893 408">Please let me know if you have any questions.</div> <div data-bbox="543 431 785 490">thanks!<br/>Arne<br/>_Assigned to Jessica Gan Lee_</div> |
| <div data-bbox="314 864 364 876">google_tppn</div> <div data-bbox="1099 864 1225 876">Privileged/Confidential 1/1</div> |                     |   |

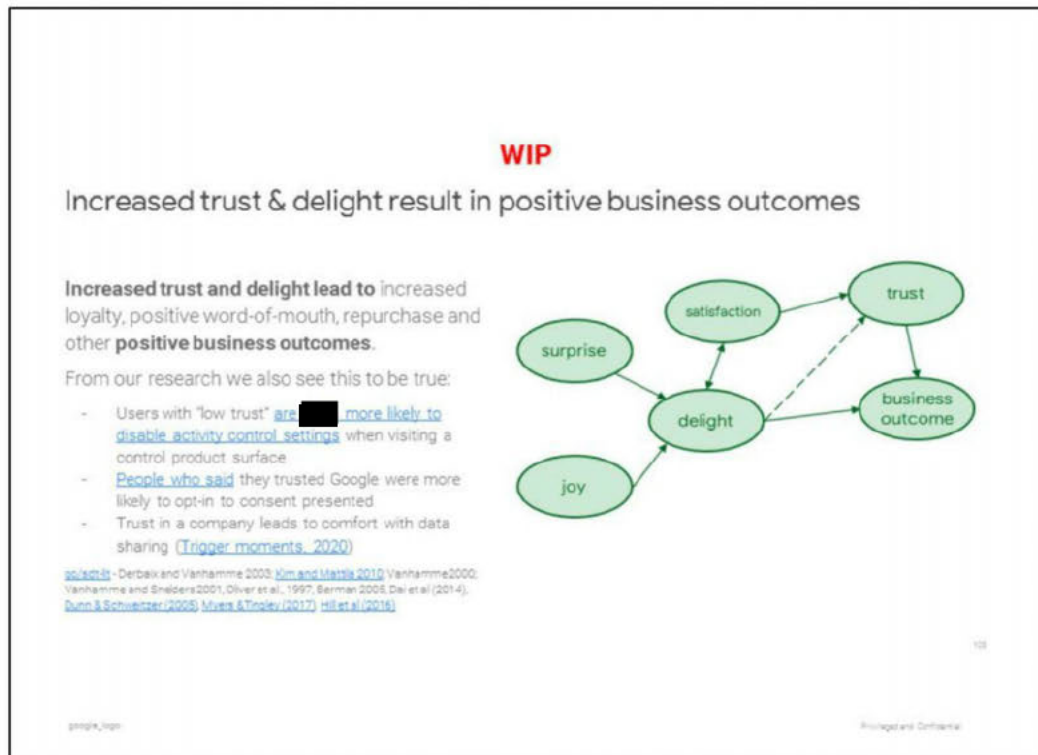


## Executive summary - Things we'll cover today

1. **Trust** is the willingness to take a **risk** based on expectation of **benefit** and is built **over time**
2. Google's few **consent** moments alone, very early in the relationship, are **not enough to help users form accurate expectations** about risks involved and benefits gained when engaging in a data-sharing relationship with Google.
3. This can lead to **unpleasant surprises** when users engage with Google products; this **harms trust** and further feeds a negative feedback loop and **impairs our trust building efforts**
4. To support **rebuilding trust** in Google, we should engage in a **ongoing in-context transparency & control conversation** that allows people to form and retain and up-to-date and accurate expectations about risks involved and benefits gained and **build trust over time**.

google\_vign

Privileged and Confidential



### Trigger moments:

Trust in company leads to comfort with data sharing

[https://docs.google.com/presentation/d/1bDAD8PNeKc1ec\\_MD5sGk9fTpAfGhSkAEUY0ZgBlrGWk/edit#slide=id.g7499fb8892\\_2\\_1685](https://docs.google.com/presentation/d/1bDAD8PNeKc1ec_MD5sGk9fTpAfGhSkAEUY0ZgBlrGWk/edit#slide=id.g7499fb8892_2_1685)

### UNEXPECTED EVENTS AND USER EXPERIENCE - SURPRISE AS A DESIGN STRATEGY FOR INTERACTIVE PRODUCTS

Unexpected Events and User Experience. Surprise as a Design Strategy for Interactive Products

Beyond Surprise: A Longitudinal Study on the Experience of Visual-Tactual Incongruities in Products

<http://www.ijdesign.org/index.php/IJDesign/article/view/1036/399>

Surprise as a Design Strategy

<https://www.jstor.org/stable/25224165?seq=1>

[https://www.academia.edu/12962460/Surprise\\_as\\_a\\_design\\_strategy](https://www.academia.edu/12962460/Surprise_as_a_design_strategy)

Surprise! Why the Unexpected Feels Good, and Why It's Good For Us

<https://www.wnycstudios.org/podcasts/takeaway/segments/surprise-unexpected-why-it-feels-good-and-why-its-good-us>

Why Humans Need Surprise: Embrace the Unpredictable and Engineer the

Unexpected

[https://greatergood.berkeley.edu/article/item/why\\_humans\\_need\\_surprise](https://greatergood.berkeley.edu/article/item/why_humans_need_surprise)  
[https://books.google.de/books?id=HdzbAwAAQBAJ&pg=PT25&lpg=PT25&dq=reasons+for+surprise&source=bl&ots=LP46M9YiDC&sig=ACfU3U3NFBt3J8CBoX-iiUCLZx0jxLaCDw&hl=en&sa=X&ved=2ahUKEwjDsMz69ojqAhVL0aYKHUAeC\\_IQ6AEwEHoECAkQAQ#v=onepage&q=reasons%20for%20surprise&f=false](https://books.google.de/books?id=HdzbAwAAQBAJ&pg=PT25&lpg=PT25&dq=reasons+for+surprise&source=bl&ots=LP46M9YiDC&sig=ACfU3U3NFBt3J8CBoX-iiUCLZx0jxLaCDw&hl=en&sa=X&ved=2ahUKEwjDsMz69ojqAhVL0aYKHUAeC_IQ6AEwEHoECAkQAQ#v=onepage&q=reasons%20for%20surprise&f=false)

Surprise principle

<http://changingminds.org/principles/surprise.htm>

Emotional design - Donald Norman

<https://medium.muz.li/the-art-of-emotion-normans-3-levels-of-emotional-design-88a1fb495b1d>

go/reassure